

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

BRANDON T. FLAKES
xxx-xx-7508
2521 Open Range Dr
Fort Worth, TX 76177

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CASE NO.23-41611
CHAPTER 13

DEBTOR(S)

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY CO-DEBTOR STAY ON
REAL PROPERTY LOCATE AT 2521 OPEN RANGE DRIVE, FORT WORTH, TX 76177 AND
WAIVER OF THIRTY-DAY HEARING REQUIREMENT AND REQUEST FOR HEARING TO BE
HELD IN PLANO, TX

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Brandon T. Flakes, Debtor herein, filing this Response to Motion of U.S. BANK TRUST
NATIONAL ASSOCIATION, for Relief from Automatic Stay, and hereby objecting to same,
respectfully shows as follows:

1. Debtor(s) admits the allegations of paragraph 1 to 4.
2. Debtor(s) denies the allegations of paragraph 5 to 8.

DATED: April 12, 2024

Respectfully submitted,

BARRON & CARTER, L.L.P.
P. O. BOX 1347
NEDERLAND, TEXAS 77627
(409) 727-0073

BY: /s/ Diane S. Carter
DIANE S. CARTER
TBA NO. 24043310
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2024, a true and correct copy of the above and forgoing Response to Motion of U.S. BANK TRUST NATIONAL ASSOCIATION shall be served via electronic means, if available, otherwise by regular, first class mail, to....

**Capital One Auto Finance,
a division of Capital One, N.A.,
c/o AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118**

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702

Courtney M. Flakes
2521 Open Range Dr.
Fort Worth, TX 76177

Brandon T. Flakes
2521 Open Range Dr
Fort Worth, TX 76177

Nathan Frederick Jones Smith
Malcolm Cisneros A Law Corporation
2112 Business Center Drive, Second Floor
Irvine, CA 92612

The County of Denton, Texas
McCreary, Veselka, Bragg & Allen, P.C.
P.O. Box 1269
Round Rock, TX 78680

Northwest ISD
Linebarger Goggan Blair & Sampson, LLP
C/O Lisa Large Evans
2777 North Stemmons Frwy
Suite 1000
Dallas, Tx 75207

Tarrant County
Linebarger Goggan Blair & Sampson, LLP
C/O Lisa Large Evans
2777 North Stemmons Frwy
Suite 1000
Dallas, Tx 75207

**Nationstar Mortgage LLC
as servicer for U.S. Bank National Association,
not in its individual capacity but solely as trustee for
RMTP Trust, Series 2021 Cottage-TT-V
c/o Richard E. Anderson
Anderson Vela, LLP
4920 WESTPORT DRIVE
THE COLONY, TX 75056**

Carey D. Ebert
P. O. Box 941166
Plano, TX 75094-1166

This service complies with Local Rules of Bankruptcy Procedure 9013(e).

/s/ Diane S. Carter
DIANE S. CARTER